

Threshold Criteria for Assessment Grants

A. Applicant Eligibility - The Idaho Department of Environmental Quality (IDEQ), an agency of the Idaho State Government, is eligible to apply for and is seeking a community-wide petroleum assessment grant for the entire state of Idaho.

B. Letter from the State of Tribal Environmental Authority - IDEQ is the State of Idaho's environmental authority; accordingly, no letter is required.

C. Site Eligibility and Property Ownership Eligibility - This proposal is for a community wide assessment grant. IDEQ has not selected specific sites for participation at the time of this proposal. IDEQ will ensure compliance with site eligibility requirements and petroleum determinations described in the EPA Brownfields Grants Guidance as IDEQ selects specific for assessment.

Ranking Criteria

A. Assessment Grant Proposal Budget – Petroleum

	Tasks					
Budget Categories	Grant Management	Public Involvement	Inventory and Prioritize	Phase I & II Assessment	Cleanup Planning	Total Costs
Personnel	4,000	3,000	1,000	2,000	2,000	12,000
Travel	1,000	1,000	1,000	2,000	0	5000
Supplies	0	500	500	500	0	1,500
Contractual	0	0	4,000	170,000	7,500	181,500
Total	5,000	4,500	6,500	174,500	9,500	200,000

Task 1: Grant Management - This task involves completing all reporting requirements, overseeing the grant budget and overseeing the implementation and completion of the remaining tasks identified in the above budget table. IDEQ Response Program staff have considerable expertise managing IDEQ's 128(a) cooperative agreement with EPA, which involves overseeing approximately \$350,000 in annual assessment activities, and assisting with the management of various EPA Brownfield grants awarded to Idaho entities including revolving loan fund grants (Reuse Idaho Brownfields Coalition [RIBC] Revolving Loan Fund), assessment grants (Washington County), and cleanup grants (Idaho Parks and Recreation and Salmon Urban Renewal Agency). Our experience with brownfields grant management reduces the amount of time needed to familiarize ourselves with grant management and reporting requirements, freeing up more funds to dedicate toward the inventory, assessment, and cleanup planning of proposed sites. Since IDEQ has successfully negotiated work plans and cooperative agreements with the EPA Brownfield Program, we are already intimately familiar with required terms, conditions, and reporting requirements associated with brownfields grants and can fulfill said requirements efficiently. IDEQ is also familiar with the required petroleum determinations necessary to address petroleum sites with EPA Brownfield Assessment Grant funds. Compliance with eligibility requirements, Endangered Species Act and National Historic Preservation Act requirements, and reporting will constitute the majority of personnel time for this task. Some amount of travel will be required for this task in order to meet with and train IDEQ regional staff who will implement this proposal in their respective regions.

Task 2: Public Involvement - IDEQ will work closely with EPA and the project partners listed in Section G of this proposal to develop a Community Involvement Plan (CIP). CIP provisions will specifically address the following: encouragement of public involvement in the inventory, assessment, and cleanup planning process, communication of Program plans and milestones to the general public, solicitation of brownfield properties for the inventory, public input identifying high-priority sites from the inventory. With respect to sites selected for Phase I and/or Phase II assessment activities, IDEQ will solicit and respond to community concerns related to health and environmental threats from the suspected petroleum contamination at those properties. IDEQ

anticipates drafting and implementing the CIP efficiently as IDEQ's Response Program has helped prepare and implement the CIPs of Idaho entities receiving EPA Brownfield Grant awards, including a petroleum area-wide assessment grant award (Capitol City Development Corporation FY2004 award). IDEQ will conduct additional cross promotions in conjunction with RIBC's RLF marketing efforts, IDEQ's 128(a) outreach efforts, and IDEQ's Pollution Prevention and UST/LUST Programs. These cross-promotional activities will decrease the need for personnel and supply funds for this budget item.

IDEQ will utilize its existing 'Brownfields Revitalization' web page, which includes a state-wide inventory of brownfield sites identified by IDEQ's Response Program in conjunction with the LUST program to promote these assessment efforts and to make all project-related documents and reports available to the public. IDEQ will develop and distribute informational fact sheets, and designate a spokesperson for the assessment grant. Fact sheets will be developed and distributed at the start and conclusion of the grant and at the completion of each phase of the grant. IDEQ will prepare and distribute individual fact sheets to the target population during key phases of each site-specific assessment conducted through this grant utilizing funds listed in the supplies line item for this task. IDEQ will travel to conduct and participate in public meetings in support of this assessment grant as reasonable and necessary. In addition to holding question and answer sessions at the public meetings, IDEQ will distribute questionnaires to and will conduct additional follow up interviews with parties interested in further participating in the public involvement process, necessitating expenditures on associated presentation supplies.

Task 3: Inventory and Prioritize - IDEQ's Response Program recently developed a web-based inventory of Idaho brownfields. Since 2003, IDEQ confirmed more than 120 sites (and identified 703 potential sites), including approximately 62 petroleum sites (294 potential sites), for inclusion into the Waste Division Inventory (WDI) as brownfield sites. IDEQ's Response Program follows annual procedures for continuing its inventory efforts; annual activities include meeting with and soliciting current knowledge of brownfields from IDEQ regional staff, IDEQ program managers, regional and local economic development professionals, city and county government staff, developers, real estate agents, environmental contractors, volunteer inventory efforts statewide, current EPA community-wide assessment grantees (Caldwell and CCDC), and RIBC. In addition to these Response Program efforts, IDEQ's LUST Program manages a database with information on every LUST site in the state of Idaho, currently totaling 1,395 sites including 164 open sites. Under this Task, IDEQ will solicit bids and enter a contract wherein the selected contractor will: assist with CIP development and implementation; provide information on all LUST sites identified via the above-mentioned efforts; review each site and run a cross-check with EPA's site and owner eligibility requirements; develop a matrix for prioritizing inventoried properties; conduct prioritization efforts in conjunction with IDEQ and its brownfield partners; and produce a final prioritized inventory. IDEQ and RIBC have established ranking criteria for prioritizing work on brownfield sites. IDEQ plans to derive the prioritization tool for this proposal from these existing ranking criteria. IDEQ will utilize storage media, film, GIS/GPS equipment, color printouts, and maps in the inventorying and ranking of these target sites, which will create a need to purchase some supplies for this effort.

Task 4: Phase I and II Assessment - Through IDEQ's Response Program cooperative agreement with EPA, IDEQ conducted assessment activities at multiple petroleum sites throughout Idaho and already has two petroleum assessments planned for early 2007. Experience shows that Phase I assessments for these sites can range from \$3,000 to \$4,000; Phase I assessments have grown more expensive as we now design our Phase Is to meet AAI requirements. Phase II assessments can range from \$20,000 to \$80,000 depending on age, number, and capacity of underground storage tanks (UST) and associated equipment. IDEQ will seek to assess sites whose assessments costs fit within the \$30,000 per site range in order maximize the number of sites assessed. Based on these assumptions, the minimum number of sites we would expect to assess, both Phase I and Phase II, would be four (4). With careful planning, partnering with local government agencies, leveraging of funds with other IDEQ programs and local governments, and proper prioritizing, this number could reasonably be stretched to six (6) or seven (7) sites. IDEQ personnel will provide technical oversight during the planning,

field operations, and reporting stages of the assessments. IDEQ will be able to utilize existing LUST staff to provide the needed oversight, minimizing personnel costs needed to complete this task. Many petroleum brownfield sites are in rural locations and may require a significant amount of travel. Field personnel will be required to observe health and safety plans and come equipped with proper personal protective equipment. Additional supplies will include standard items for report generation and satisfying public record requests associated with site assessment activities.

Task 5: Cleanup Planning - Assuming the sites IDEQ assesses contain confirmed contamination, IDEQ is prepared to assist with the cleanup planning for the assessed properties. Our cleanup planning will focus on proposed revitalization and reuse plans, compliance with state and federal cleanup standards, utilization of IDEQ's Risk Evaluation Manual (REM), and conforming to the required elements of the Analysis of Brownfield Cleanup Alternatives (ABCA). In many cases, cleanup planning in the form of a REM analysis will be conducted by IDEQ waste and remediation staff as part of their normal technical role which will translate into cost savings for this budget item. IDEQ may gain additional cleanup planning efficiencies if sites requiring cleanup enter into IDEQ's Voluntary Cleanup Program (VCP). VCP participants must develop a Proposed Cleanup Plan and must provide \$2,500 to IDEQ to fund IDEQ's VCP oversight responsibilities. IDEQ included contracting costs under this task, as IDEQ's contractor will be authorized to include in assessment reports any requested cost proposals for preferred cleanup plans. IDEQ's Response Program experience shows contractors typically charge \$2,000 to \$3,000 for cleanup or corrective action plans with cost estimates.

B. Community Need

1. Target Community - According to the Seattle Regional Office of the Economic Development Administration, 74% of Idaho's regions (42 of 57) meet the federal Economic Development Administration (EDA) "Area Distress" criteria based upon per capita income and unemployment rates. While some of these areas, such as Boise and Ada County (pop.312,839) do not fall under EDA distress factor guidelines, Ada County is home to the largest number of economically disadvantaged persons in the state, totaling 24,656 or 12% (US Census Bureau statistics). This is reflected in "pockets of poverty" found in low-income neighborhoods identified and targeted for funding by Census Tract. IDEQ's experience with rural communities during brownfields assessment, demonstrated that these rural communities lack the capacity to apply for and manage their own EPA Brownfield grants. This lack of capacity includes: difficulty raising 20% matching funds for cleanup grants; lack of staff time, expertise, or compensation needed to apply for and manage grants; and minimal familiarity with technical aspects of brownfield grant management. Since 74% of Idaho is considered "Area Distress" by the EDA, it should be no surprise that the cities and counties in these areas do not have the financial or personnel capacity to propose or manage their own EPA Brownfield grants. This lack of capacity is exacerbated by the fact that IDEQ's 128(a) funds are largely committed to current assessments for the 2007 grant cycle. Consequently, without this assessment grant, many communities will have to wait until 2008 at the earliest to receive needed site assessments. As it stands in today's market, it is less expensive and financially risky to develop open space than it is to pay for an assessment and plan for cleanup of brownfield properties prior to development. If this equation stays the same, Idaho communities will continue to sprawl, developing properties that were former forested areas, riparian areas, and other open space properties that currently protect and filter Idaho's ground water by acting as natural infiltration galleries, support wildlife habitat, or are used for agriculture.

2. Community Benefit - Many Idaho communities are currently struggling with a lack of available commercial property in their main commercial corridors. Other communities are experiencing a decline in their commercial districts due to mothballed, blighted, or otherwise vacant properties. Often, these properties were gasoline service stations and the current or former owners are reluctant to sell or assess the sites due to fear of contamination and the threat of regulatory enforcement or loss of property value. Petroleum brownfield sites present a unique opportunity for commercial redevelopment due to their proximity to high traffic areas and commercial centers, existing infrastructure, highly visible locations, and ease of entrance and egress for

automobiles. Additionally, assessment and subsequent cleanup of these sites mitigate potential threats to human health and the environment posed by the possible presence of soil and water contamination on or beneath such sites. Petroleum assessment funds often resolve environmental barriers to the purchase and redevelopment of these sites. The vast majority of petroleum brownfield sites identified by IDEQ are abandoned or underutilized and represent a loss of potential property, sales, and income tax revenues for the community and the state, in addition to potential jobs, housing, or public services. Revitalization of these properties adds to the economic stability of Idaho communities through increased tax revenues, employment, housing, and expanded services.

3. Brownfield Impacts - There are a number of Idaho Railyards in need of revitalization. For example, the 40-acre UPRR Railyard is located in the center of downtown Pocatello, Idaho. Pocatello, like other Idaho cities, is struggling to address environmental issues hindering revitalization of this area. Idaho's rural communities are struggling to reuse former lumber mill sites. In the past decade, Boise Cascade Corporation, a large Idaho employer, closed all of its Idaho lumber mills. For example, lumber mills closed in the cities of Horseshoe Bend (pop. 812), Cascade (pop.962), Emmett (pop.5,752); and Council (pop. 816). Until closure, the mill was each city's primary employer; these communities are now working to revitalize the abandoned mills. Numerous mining operations have also closed down throughout Idaho, leaving communities with environmentally damaged properties. Nearly every town in Idaho has at least one abandoned, pre-regulation landfill or dump ranging in size from 5 to 50 acres per site. In addition to these ubiquitous brownfields statewide, nearly every city and county has at least one abandoned and/or contaminated former petroleum storage and distribution site. In many instances, these sites are situated in high profile areas in Idaho cities, generally busy intersections in the heart of commercial districts, and present a noticeable blight and/or attractive nuisance. Below are some area-specific examples of petroleum brownfields and their impacts on the community. The sites listed below (294 potential sites) are in addition to the 62 confirmed petroleum brownfields previously inventoried by IDEQ.

Interstate 90 is the longest east to west interstate in the nation, beginning in Seattle and ending in Boston with a distance of 3,020.54 miles. I-90 cuts through the northern section of Idaho, the Panhandle, and is an important connector between Seattle and Missoula. The Idaho portion is 84 miles long and served an average of 55,000 vehicles per day in 2005. The Western I-90 Corridor serves Kootenai County, including the cities of Coeur d'Alene, Hayden, and Post Falls. Kootenai County, also known as the Coeur d'Alene Metropolitan Statistical Area, ranked 14th highest in price appreciation of the 275 metropolitan statistical areas in the United States. The average price of a Kootenai County home rose 27.73% in price while at the same time the city of Coeur d'Alene is experiencing a growth rate of nearly 10%. Many local families can no longer afford to live within the city limits due to the high housing prices. IDEQ's Brownfields Program has identified 106 potential petroleum sites needing assessments along the Western I-90 corridor; 79 potential sites within Coeur d'Alene and another 27 potential sites in Post Falls, 25% of these being vacant. Brownfield assessment and cleanup could lead to the development of low-income housing on many of these former petroleum sites. Petroleum assessment in this area is needed because these cities sit atop the Rathdrum Prairie Aquifer, a sole-source aquifer supplying drinking water to over 300,000 people. Soils developed over the aquifer are well-drained, therefore there are no restrictive layers in the unsaturated zone which makes it highly susceptible to petroleum contamination from many of the inventoried petroleum sites. This contamination adds to the risk of leukemia, liver and kidney damage, and other health effects caused by the inhalation and ingestion of petroleum contaminants.

The Eastern I-90 Corridor serves Shoshone County, including the cities of Kellogg, Mullan, Pinehurst, Osburn, Smelterville, and Wallace. The eastern corridor is quite different from the western corridor, consisting primarily of mining towns. IDEQ identified 170 potential petroleum brownfield sites in this eastern corridor. Most of these sites are located in the mining towns of Kellogg and Wallace. Wallace was added to the National Register of Historic Places in 1976 and is called the "Silver Capital of the World" due to the amount of silver produced from this area. The town of Kellogg was once the home of the Bunker Hill Mine, but today Kellogg

is in the heart of the second largest Superfund site. After the closure of the mine the town wanted to change its image, adopting an Alpine village theme. The town now welcomes winter sports enthusiasts and recently undertook the construction of a gondola on top of the Silver Mountain Ski resort. Petroleum assessment funds could spur further revitalization of these historic mining towns, enticing more businesses to take advantage of these redevelopment opportunities and resulting in an increase in tourism.

The City of Shelley is located in Bingham County in southeast Idaho. The City has a poverty rate of 12%, slightly higher than the State's 11.8% and a per capita income of \$17,621. The population in Bingham County is 84% farm workers, typically without health insurance. The City is unfortunately facing another environmental factor because it lies near the Snake River and Gem Lake Dam, which was declared an emergency drought area as of May 28, 2002. There are at least 9 potential petroleum sites within the City of Shelley that IDEQ identified. All of these sites are former gasoline stations or service stations. Many of these sites are vacant or underutilized. Businesses are constructing newer buildings rather than buying these properties, due to the perception that they are contaminated.

C. Site Selection Process

1. Selection/Criteria/Eligibility - IDEQ chose to apply for the community-wide assessment grant in order to serve as many residents and local governments as possible. Sites will initially be selected for inclusion in the brownfield inventory by analyzing whether or not the proposed property fits the EPA definition of a brownfield. Additionally, inventoried properties will be listed in the publicly accessible IDEQ Waste Division Inventory database. The inventory will be developed utilizing the Program's partners (listed in Section G), local government, state and local health agencies, real estate agents, developers, IDEQ regional and UST/LUST staff, and the general public.

IDEQ will choose potential sites based on the following criteria: properties that are underutilized, vacant, or abandoned, properties that have known or perceived contamination which is hindering redevelopment, properties that have little or no current environmental assessment, properties that have developer interest or a solid reuse plan, properties that will add to the present amount of green/open/public space, properties owned by public or non-profit entities who did not contribute to the contamination, sites that can be accessed for assessment, sites that have a reuse plan with measurable economic or social benefit and strong community support, sites that when assessed, cleaned up and redeveloped will address environmental justice issues and protect human health and the environment, sites that have leveraged funds for cleanup and redevelopment, sites with existing infrastructure, sites that are ready to proceed with redevelopment once assessment and/or cleanup is complete, and sites that are eligible under brownfields law. Of course IDEQ will seek to maximize the number of assessments it can complete under this grant, so sites with leveraged funds and smaller, less expensive sites, all else being equal, will tend to rise to the top. Nevertheless, IDEQ will develop a formal prioritization and ranking tool based on similar tools used for its 128(a) grant and the Idaho Community Reinvestment Pilot Initiative.

EPA Region 10 developed eligibility screening tools for assessments at petroleum sites. IDEQ will utilize this screening tool and submit an eligibility determination request and petroleum determination letter to EPA for each site to be assessed. Also, prior to any sample collection, IDEQ's contractor will submit a site specific QAPP for EPA approval.

2. Possible and/or Previous Inventory Activities - IDEQ state and regional UST/LUST staff and Brownfields Program staff are currently engaged in efforts to inventory petroleum brownfield sites throughout Idaho and place these sites into IDEQ's WDI. This effort includes confirming the brownfield status of these sites, collecting coordinates with global positioning satellite technology, and taking photographs of the properties. In response to the Underground Storage Tank Compliance Act (USTCA), IDEQ's UST program will complete over 350 UST inspections by August 2007. During these inspections, IDEQ staff typically find

that 20% of inspected sites are vacant and fit the definition of a brownfield. Consequently, through UST inspections alone, IDEQ expects to identify at least 70 new petroleum brownfields sites in 2007. In order for these sites to be redeveloped, the UST's will need to be removed and the site assessed and, if warranted, cleaned up. Regional IDEQ UST/LUST staff are beginning to conduct informal inventories of former UST sites within their region and report their findings to the Brownfields Program. In November, 2006, the southwest Idaho region identified nine (9) vacant, former UST sites in the town of Weiser, Idaho. Six (6) of these sites were for sale. Locals indicated that no one is interested in purchasing these properties due to fear of contamination. IDEQ is committed to continuing these inventory efforts and expects to identify many more properties facing similar circumstances over the next three years. Other examples of IDEQ LUST staff inventory efforts were described in section B.3 above.

As recipients of EPA Brownfield Assessment Grants, Capital City Development Corporation (CCDC) and the City of Caldwell are inventorying petroleum brownfields sites in downtown Boise and Caldwell, respectively. CCDC identified over 40 confirmed petroleum brownfields sites in Boise, and Caldwell confirmed eight (8) petroleum brownfields sites in the proposed Indian Creek realignment path. IDEQ organized a brownfields volunteer group charged with inventorying brownfields sites in Sandpoint Idaho. To date, this group met three times and is developing its comprehensive inventory. Finally, IDEQ's Coeur d'Alene Regional Office commissioned an effort to identify potential historic waste sites in Kootenai and Bonner Counties. The resulting effort identified 75 historic UST sites in addition to those already listed in IDEQ's WDI. The engineering group responsible for the inventory effort estimated that approximately 20 of these sites fit the definition of brownfields. Some of these sites lie in the I-90 corridor discussed above. IDEQ will confirm whether or not these sites have been accounted for in the I-90 survey before adding them to our list of potential petroleum brownfield sites.

3. Access Issues - This proposal is crafted with the intent to focus primarily on known or suspected petroleum sites that are abandoned, mothballed, and/or blighted and pose a potential benefit to the community if assessed, cleaned up, and revitalized. IDEQ will utilize a Community Involvement Plan (CIP) to educate private entities about the benefits of granting access to suspected petroleum brownfields sites for assessment. IDEQ has extensive experience delivering presentations about the pros and cons of allowing access for site assessments. Presentations outline the protections available to landowners who cooperate with assessment programs as well as the potential liabilities for not assessing known or suspected contamination. IDEQ has a three year record of successful site access negotiation with private entities and local governments. Landowners, once they understand the benefits of granting access also often provide in-kind services to facilitate our assessment. Another benefit IDEQ highlights is the potential eligibility of RIBC RLF and Community Reinvestment Pilot Initiative funds for sites that have completed assessments and require some type of cleanup. Also, IDEQ will inform brownfield site owners and prospective purchasers that participation in IDEQ's Voluntary Cleanup Program (VCP) requires a completed assessment. Liability protections offered by IDEQ's VCP prove to be a strong motivator for landowners to grant site access. Finally, IDEQ has success stories posted on its website outlining the successful assessment of publicly and privately owned brownfield sites, including petroleum sites. IDEQ's Brownfield Program currently enjoys positive word of mouth among the general public. This positive reputation simplifies the process of securing site access agreements from private individuals.

D. Sustainable Reuse of Brownfields

1. Pollution Prevention - Focusing development on properties that can utilize existing infrastructure results in less overall pollution, lower redevelopment costs, community connectedness, and a better quality of life for Idaho communities. Sites with existing infrastructure will be given preference during site selection, as it directly affects other criteria such as developer interest and options for redevelopment. IDEQ will encourage a host of best management practices on brownfields sites including: utilization of grey water recycling systems, installation of green roof storm water management systems, installation of native species storm water drainage

buffer systems, installation of Energy Star approved appliances and associated hardware (light bulbs), use of passive solar design, and utilization of locally and sustainably produced building materials. Additionally, IDEQ will encourage target communities to participate in and adopt the building principals of the Idaho Chapter of the US Green Building Council (USGBC) in order to construct buildings that meet the Leadership in Energy and Environmental Design (LEED) standards. IDEQ produced a *Brownfield Funding Resource Manual* listing federal, regional, state, and local sources of environmentally sound brownfield redevelopment funding for post assessment and cleanup projects. IDEQ will assist target communities in their efforts to secure funding to facilitate xeriscape, stormwater management, green building, habitat restoration, and other best management practices for their brownfield revitalization projects through our water quality and pollution prevention programs. Finally, the Small Business Administration has a prime rate loan program for small business startups, which could be used to fund sustainable redevelopment options.

2. Economic Benefit - Redeveloping lands that have existing infrastructure makes good planning sense, reduces sprawl, reduces infrastructure maintenance expenses, and keeps redevelopment affordable. Brownfields redevelopment activities also create jobs close to where people live. Redevelopment of brownfields provides living wage jobs, a relative scarcity in Idaho. Redevelopment also directly increases local and state tax revenues through increases in business, property, and personal income taxes. Revitalization of previously disturbed land also has the benefit of preserving open space elsewhere. Undisturbed open space in much of Idaho supports wildlife habitat. This is vitally important economically as many rural towns rely heavily on revenue generated from hunting and fishing. Undisturbed land also acts as a water-purifying infiltration gallery for Idaho's ground water. Ground water represents the source of 97% of Idaho's drinking water, an extremely valuable commodity in our arid state.

Through use of a carefully crafted screening tool based on the criteria presented in Section C above, all else being equal, projects with obvious or documented economic benefit will rise to the top of the site prioritization list. IDEQ anticipates assessment of between four (4) to seven (7) sites through this grant. Consequently, projects will have to be well designed, supported by the community, and must contain measurable economic benefit to the target community to receive an assessment under this grant. Examples of documented economic benefit include the following: amount of property tax revenue increase expected after revitalization and an accounting of how those revenues will be used to promote the sustainable use of brownfields and/or greenspace; expected rise in property values for the surrounding community after project completion; number of temporary and permanent jobs created as a result of the project as well as projected salaries; number of businesses expected to be attracted by the project; and documented protection or remediation of natural resources including ground/surface water and wildlife habitat. Additionally, IDEQ has a statewide pollution prevention program (Patti Best, Amy Luft) that can provide invaluable assistance in accomplishing these goals.

3. Community Concerns - Since this is a statewide assessment grant proposal, IDEQ does not have direct control over how a community will revitalize and maintain a site once it receives an assessment and, if needed is cleaned up. However, our site prioritization and selection tool will be crafted in such a way that projects seeking to create economic development, create parks, develop important community centers, build affordable housing, link transportation/walking/biking corridors, develop open space and improve habitat, include best management practices with regard to pollution prevention, provide healthy recreation activities, or address sensitive or underserved populations will tend to be favored over other potential participants with less concrete or beneficial plans. IDEQ's CIP, as well as local community efforts aimed at addressing community concerns with respect to petroleum sites, when executed properly should aid in identifying and planning for issues that are important to the community with regard to brownfield revitalization. IDEQ will prioritize projects that address these identified concerns in their revitalization plans.

E. Creation / Preservation of Greenspace

Petroleum brownfield sites in Idaho tend to be located in key commercial areas, have good transportation access, are served by existing infrastructure, contain useable structures and parking, and provide adequate space for commercial, non-profit, or municipal uses. Developing these sites will slow sprawl into previously undeveloped land surrounding Idaho communities, much of which is still productive agricultural land, forest, riparian, or wilderness. Slowing the sprawl around Idaho communities by encouraging redevelopment of former petroleum sites will preserve open space and prevent the type of disconnected, unplanned development that is currently plaguing much of Idaho. Lack of assessment for petroleum sites indirectly contributes to sprawl, resource depletion, and loss of green and open space as the outer fringes of Idaho communities are developed, bypassing brownfields sites.

IDEQ's involvement in assessing petroleum sites through the Brownfield Program constitutes assessment of approximately twelve (12) acres over eight (8) sites. Planned reuse for these properties include approximately seven (7) acres of public park and green space, a rural fire station (0.5 acres), seven (7) businesses situated on approximately one (1) acre of assessed sites, and a one (1) acre mixed use residential and retail development. Only 2.5 acres assessed with 128(a) funds will require cleanup prior to being revitalized for commercial use. Additionally, IDEQ provided assistance and oversight to the City of Caldwell's communitywide assessment grant for petroleum. To date, that grant assessed over five (5) sites on six (6) acres which will be a key component of their Indian Creek daylighting and green space development project.

Our focus, with respect to this grant, will be to assess properties with similar redevelopment plans as those outlined above. Local governments interested in brownfields redevelopment are utilizing various funding mechanisms including property tax collections, community development block grants, and 99-year leases. Private parties have to develop extensive business plans and forecasts in order to attract the kind of investment and financing to make their projects successful. While IDEQ cannot dictate long term management and preservation of revitalized brownfield properties, the screening process outlined in Section C above will be designed to weed out projects that do not have a long term commitment to funding and maintaining parks, green space, or other non-profit use. Additionally, IDEQ can assist communities with their long term management by working with communities to develop, implement, and maintain institutional controls designed to protect revitalized brownfield properties. Finally, IDEQ will act as a liaison to connect brownfield revitalization participants with various funding sources and partners such as RIBC, local economic development groups, and other sources as listed in the IDEQ *Brownfield Funding Resource Manual*.

F. Pre-Award Notification

1. Notification Process - IDEQ's website has a section devoted specifically to the IDEQ Brownfield Program. IDEQ will post appropriate grant proposal information on the Brownfields Revitalization "Upcoming Events" section. The posting will provide an overview of the scope and purpose of this proposal as well as key dates and status updates during the review and award process. Instructions linking visitors to the proposal and an opportunity to comment will be provided. Additionally, in conjunction with our 128(a) efforts and partnership with RIBC, IDEQ brownfield staff will inform DEQ regional UST/LUST staff as well as city and county officials about our proposal as we solicit sites for inclusion in the WDI. Contacts with regional staff and local governments will be in person, by telephone, and by email. In all cases, contacted individuals will be provided with instructions for accessing and commenting on the IDEQ proposal. Additionally, IDEQ's 128(a) efforts currently include working with volunteer groups and Oregon's Technical Assistance to Brownfields staff to identify, inventory, and prioritize brownfield sites in six cities throughout Idaho, one city per region. Volunteers will be familiar with this proposal and will assist in our community notification efforts. RIBC will also assist IDEQ notification efforts by including the proposal plan in their outreach efforts, which include face to face meetings with local economic development agencies statewide, email distribution, and website information. When the awards are announced in 2007, if selected, IDEQ will prepare a legal notice to run in the statewide newspaper, the Idaho Statesman, as well as prepare press releases for dissemination among all of

Idaho's media outlets including print, radio, and television. In 2006 EPA conducted a kickoff media event in Boise to announce grant awards in Idaho. IDEQ plans to participate in this event should it recur in order to further raise public awareness of the proposal. In all cases, interested parties will be furnished with instructions for reviewing and commenting on the proposal including the name and contact information of the project spokesperson, date of comment period, and method for submitting comments (email, fax, USPS mail). Finally, IDEQ brownfield staff make multiple presentations statewide each year. Our proposal will be highlighted as appropriate at these presentations and workshops. Our first opportunity will occur this week at the first annual Idaho Environmental Summit, a three day workshop including 350 environmental and business professionals interested in Idaho's environmental quality.

2. Support for Notification Process - For the past three years, the Brownfield Revitalization page was ranked second for the entire agency in terms of visitors to the site. This indicates that our website is a valuable tool for disseminating information about Idaho brownfields. Once the RIBC website is launched, IDEQ and RIBC will cross link with each other to increase awareness of both programs. Additionally, our brownfields staff make a point to gather anecdotal information from Program participants regarding how they heard about our program. The top sources of initial information tend to be: IDEQ's website; word of mouth among developers and planning and zoning staff at cities and counties; our RIBC partners; media stories; workshop/conference attendees who attend IDEQ brownfield presentations; and environmental consultants. Our staff also interacts with regional IDEQ staff, other agency staff, and city and local government staff one on one to promote the overall IDEQ Brownfield Program. Our current proposal will be discussed in our meetings with these individuals. Finally, IDEQ has an excellent set of email and USPS mail addresses and contacts for state and local government officials, developers, real estate agents, environmental groups, economic development professionals, and environmental consultants. We regularly contact these groups with important brownfields updates and opportunities and will do so with regard to this proposal. In the unlikely event, due to Idaho demographics, that IDEQ will interact primarily with non-English speaking target populations, we are prepared to contract with interpreters to in order to ensure compliance with public notice and outreach requirements.

3. Comment Period / Outreach - A minimum of a 30-day public comment period will be available for parties to submit comments to IDEQ regarding this proposal. This period may be extended by 15 days at the request of the public. Telephone numbers, fax numbers, U.S. Postal Service mailing addresses, and email addresses will be provided to the public so comments may be received, retained, and addressed. Public comment outreach materials will include: a brief description of the proposed assessment grant project; IDEQ spokesperson contact information; instructions on how to access the community involvement plan; overview of the comment procedures and how to get information and/or provide comments; dates and time of any public meetings, if appropriate; opening and closing dates for the comment period; locations of the information repository and times available to the public; and all relevant web site addresses. At a minimum, a public notice will appear as a legal advertisement in the classified section of our statewide paper, The Idaho Statesman. The notice may also be placed in regional publications, free publications, newsletters, public service announcements, mailing lists, signs, IDEQ and partner websites, press releases, city council and county commissioner meeting agendas, or bulletin boards available to the public.

4. Addressing Public Comments - Responses to all significant public comments will be prepared by IDEQ in conjunction with the project partners interested in participating in the public comment period. The response to comments will be included in the administrative record for this project and placed in the information repository. Additionally, comments and responses will be mailed or emailed to all persons submitting comments or indicating interest in the final disposition of the grant proposal. The comments and responses shall be maintained in the administrative record for the life of the grant and will be available for public review. If comments lead to significant changes in the planned execution of this proposal, a fact sheet will be published and distributed as appropriate via email, IDEQ website, and/or USPS mail.

G. Ongoing Community Involvement

1. Community Involvement Plan - IDEQ, through its participation with RIBC, has an extensive CIP for brownfield assessments and cleanups as described in the *RIBC RLF Implementation Plan: Community Involvement Plan*. IDEQ is adept at maximizing public involvement by disseminating project information on the IDEQ website, through email distribution lists, fact sheets, workshops/presentations/community events, public meetings, and interviews. For assessment projects, IDEQ outreach efforts target local officials, businesses, residents, developers, economic development professionals, public interest groups, and other interested and affected parties consistent with IDEQ's CIP. The initial step in conducting outreach involves designating a spokesperson and disseminating that spokesperson's contact information. IDEQ already designated the program spokesperson and advertised his contact information via the vehicles discussed at the beginning of this section. The IDEQ Brownfield Program spokesperson is responsible for responding to general questions and inquiries from the public and the media for IDEQ assessment and cleanup projects and is contacted by telephone and email multiple times a day by stakeholders statewide. IDEQ community involvement activities to date include: formation of multiple volunteer groups statewide whose purpose is to inventory brownfield sites in their community and share results with IDEQ and the community at large; conducting brownfield workshops and delivering presentations statewide; conducting brownfield site inventory/assessment/cleanup and cleanup funding/and outreach statewide; partnering with groups such as RIBC and the Idaho Rural Partnership to assist communities with brownfield inventory, assessment, cleanup, and management statewide. The goals of the CIP include: encouragement of public involvement in the inventory, assessment, and cleanup planning process, communication of Program plans and milestones to the general public, solicitation of Brownfield properties for the inventory, public input into the prioritization of sites to be assessed, and soliciting and addressing community concerns with regard to health and environmental threats from petroleum brownfield sites and their potential reuse.

2. Partnerships - IDEQ brownfield staff developed numerous partnerships within IDEQ and across the state. One of our more impressive partnerships included a collaboration of industry groups, the Governors Office, and sponsors in the Idaho Legislature to develop financial incentives for the cleanup and redevelopment of Idaho brownfields statewide. In 2006, the Idaho State Legislature unanimously passed and the Governor signed into law the Community Reinvestment Pilot Initiative which created a \$1,500,000 fund with a rural focus to provide a partial rebate for cleanup (with committed redevelopment) of Idaho brownfields. IDEQ also partners with the Association of Idaho Cities and Counties, developer groups, real estate groups, environmental contractors, and conservation groups to develop strategies for assessing and cleaning up Idaho brownfields as well as securing funding for sustained revitalization of said properties. IDEQ is also a partner with the state's six Economic Development Districts in the RIBC RLF which has \$3,000,000 available for the cleanup of Idaho brownfields. Additionally, we are developing relationships with the Nez Perce and Shoshone-Bannock Tribes to assist them with their brownfields revitalization efforts at brownfields where Tribal land, public land, and private land are components of the overall project. IDEQ also enjoys strong internal partnerships with all six IDEQ regions and various programs within IDEQ that can offer assistance in sustainable reuse of brownfield sites. Possibilities for assistance include the use of 319d grants, storm water best management practices consultations, drinking water and waste water infrastructure grants, and pollution prevention outreach and education centered around brownfield revitalization projects.

3. Communicating Progress - Fact sheets, newsletters, stakeholder meetings, project signboards and other appropriate methods may be used to keep interested parties and the public informed of the status of this project in general and of assessment activities and results at specific sites. Public meetings provide stakeholders with an opportunity to comment on the proposed assessment and potential cleanup and reuse plans. Outreach may also include participation in regularly scheduled meetings such as City Council meetings, County Commissioners meetings, planning meetings, neighborhood meetings or other mechanisms which encourage interactive communication about the project, as appropriate. In addition to holding question and answer sessions at the

public meetings, questionnaires will be distributed to and additional follow up interviews conducted with parties interested in further participating in the public involvement process. In some areas, multilingual fact sheets and other documents may be provided where there is a concentration of non-English speakers in the affected community. An interpreter may be substituted if appropriate.

An information repository shall be established at IDEQ and at appropriate locations in communities where assessments are conducted so all information pertaining to the project is readily available to interested parties. The location of the repository will be clearly stated in all public announcements. Materials to be included in the administrative record include: Current and past environmental site assessments (both Phase I and Phase II), risk assessments, background information about current and past site activities and owners; brochures, fact sheets and other information about the specific site; the site-specific CIP; cleanup plans or “no further action” letters and information relevant to known reuse plans. This information will be added to the administrative record and stored in the information repository as it becomes available as well as IDEQ’s publicly accessible WDI database. Where site assessment activities are conducted, the following information will be collected, communicated to the public and stored in the Administrative Record: names and addresses of the cleanup site, the owner/operator, and the borrower/sub-grantee; a brief description of the proposed site assessment activities as well as compliance with Endangered Species Act and National Historic Preservation Act requirements; name, address, and telephone number of the IDEQ spokesperson(s); the community involvement plan with overview of the comment procedures and how to get information and/or provide comments; dates and time of any public meetings, if appropriate; the opening and closing dates for the comment period; locations of the information repository and times available to the public; and all relevant web site addresses.

At a minimum, public notice of planned assessment activities will appear as a legal advertisement in the classified section of a broadly distributed local newspaper. The notice may also be placed in free publications, newsletters, public service announcements, mailing lists, signs, or bulletin boards available to the targeted community. The public notice will be included in the administrative record. Fact sheets will also be placed in the administrative record.

4. Community-based Involvement - Since this is a statewide grant proposal, it is not possible at this time to list the community-specific organizations IDEQ will involve in this project. However, if this proposal is successful, IDEQ will work with the organizations below as well as our regional staff to identify and include community groups that wish to be informed of and participate in efforts to inventory and assess brownfields in specific communities. The groups below have a statewide presence (with the exception of SBVG) and are committed to assisting with outreach efforts described in this proposal.

Idaho Conservation League, Courtney Washburn, Community Conservation Associate, (208) 345 6942, ext 17
The Idaho Conservation League preserves Idaho's clean water, wilderness and quality of life through citizen action, public education, and professional advocacy. ICL represents a concerned citizens groups living on or near contaminated properties.

Idaho Association of Soil Conservation Districts, Kent Foster, Executive Director (208) 338-5900
The soil conservation district is to be the leading organization for providing action at the local level to promote wise and beneficial conservation of natural resources with emphasis on soil and water. The Idaho Association of Soil Conservation Districts is a voluntary, non-profit association of Idaho's 51 soil conservation districts cooperating in the management of Idaho's natural resources. Its members work closely with the Idaho Soil Conservation Commission on problems of policy and natural resource concerns. It also provides a forum for discussion of common problems, including erosion and sediment control, water quality, forestry, research, conservation and environmental education, resource planning, wildlife and pasture and range and informs the State Legislature and the Congress of its views on natural resource concerns.

Trout Unlimited, Andy Brunelle, Boise Office (208) 334-1770

Trout Unlimited's mission is to conserve, protect and restore North America's trout and salmon fisheries and their watersheds. Trout Unlimited accomplishes this mission on local, state and national levels with an extensive and dedicated volunteer network. Trout Unlimited is currently involved in a brownfields project in Ada County, Idaho involving the decommissioning of waste water ponds in favor of developing a side channel of the Boise River for trout spawning, habitat, and additional riparian areas.

Idaho Rural Partnership, Dale Dixon, Executive Director, (208) 334-3131

The Idaho Rural Partnership (IRP) joins diverse public and private resources in innovative collaborations to strengthen communities and improve life in rural Idaho. In August 2003, the Idaho Rural Partnership (IRP) Board of Directors established the following issues and activities as priorities for IRP action: serve as "Champion" for Rural Idaho; expand competitive access to domestic and international markets; seek resolution of conflicts especially on environmental issues; provide leadership training and development; provide information on rural economic, health, infrastructure, and environmental resources.

Technical Assistance to Brownfields, Jerry Orlando, Technical Assistance Specialist (541) 737-5861

Technical Assistance to Brownfields Communities (TAB) was created to assist smaller communities which lack the resources to hire brownfield redevelopment specialists. The TAB program can provide: training for community leaders to facilitate their involvement in the brownfields redevelopment process; presentations on the redevelopment process and where to look for resources such as grants and technical expertise; and, technical assistance with specific tasks such as evaluating data from environmental sampling events and reviewing investigation and cleanup reports. TAB committed to assisting IDEQ with efforts to develop community outreach capabilities in communities where site specific assessments are to take place.

Sandpoint Brownfields Volunteer Group, Jack DeBaun, Chairman (208) 263-8970

The Sandpoint Brownfields Volunteer Group (SBVG) utilizes the services of local citizens to inventory potential brownfields within the cities of Sandpoint, Dover, Kootenai, and Ponderay. SBVG was first organized in August 2006. The purpose of this collaborative effort is to incorporate potential brownfields reuse into the City's 20-year Comprehensive Planning process.

Sage Community Resources, Kathleen Simko, President, (208) 322-7033

Sage Community Resources (Sage) is a non-profit development organization with the mission of providing assistance and resources for communities in southwest Idaho to enhance their quality of life through collaborative leadership. Sage is an economic development association of the cities and counties of southwest Idaho. In addition to economic development Sage administers or is directly involved in: a revolving loan fund in the rural areas and a Microloan program in all ten counties, the Southwest Idaho Area Agency on Aging, planning and grant administration for our member counties, and submission of candidate brownfields sites to IDEQ for assessment.

Reuse Idaho Brownfields Coalition, Pat Engel, Program Administrator, (208) 322-7033 ext. 234

The Reuse Idaho Brownfields Coalition (RIBC) is a seven member coalition including all six Idaho economic development districts and the Idaho Department of Environmental Quality. The mission of RIBC is to identify, inventory, assess, clean up, market, and redevelop brownfields in Idaho. RIBC obtained a \$3,000,000 Brownfields Cleanup Revolving Loan Fund from EPA for use in cleanup planning, remediation, and risk analysis at eligible brownfield properties.

Environmental Health Education and Assessment Program, Bureau of Community and Environmental Health, Division of Health, Idaho Department of Health and Welfare, Jim Vannoy, Manager, (208) 334-4964

The Environmental Health Education and Assessment Program (EHEAP) conducts health consultations and health assessments for communities located on or near contaminated sites. It seeks to involve community

members in planning, implementing, promoting, and evaluating environmental health education activities in order to protect public health. EHEAP staff consists of a program manager, a toxicologist, a health educator, and support staff that are responsible for assessing human health risks associated with exposure to toxic substances in Idaho's environment and educating the public about environmental health risks and ways to prevent exposure. EHEAP also works very closely with, and in some cases funds the environmental health education and assessment efforts of Idaho's seven (7) public health districts.

H. Reduction of Threats to Human Health and the Environment

1. Identification/Reduction of Threats - Assessment grant funds will be utilized to address portions of a comprehensive brownfield assessment program including education, inventorying, site selection, assessment, cleanup planning, remediation certification, and redevelopment. One of the goals of the overall program is to ensure that residents of, workers in, and visitors to Idaho are not exposed to environmental contaminants contained on or beneath petroleum sites. Another goal is to mitigate potential threats to the environment from contamination on or beneath these properties. Funds from this grant will be used to assess sites in order to confirm the absence, or confirm the presence (type, extent, and magnitude) of contamination in all site media (air, soil, and water). Of the petroleum site assessments IDEQ conducted to date, almost half had some level of contamination in the soil or ground water. Consequently, there is a high likelihood of finding soil, groundwater, and/or soil vapor that contain petroleum and petroleum byproducts. Assessment and remediation of contamination at these sites will directly improve the environment and reduce future environmental threats by determining the exposure pathways and potential receptors to contamination and the cleanup necessary to protect human health. Ultimately, source removal, elimination of exposure pathways, institutional controls, or land use restrictions may be necessary to protect human health on these sites.

Common petroleum site contaminant types include benzene, toluene, xylenes, ethylbenzene, MTBE, EDB, EDC, PAH's, lead, and physical hazards such as broken windows, deteriorating structures, piping, reinforcement bar, and wiring. These contaminant types pose a variety of health risks (including cancer, neurological damage, liver damage, and respiratory damage) depending on concentration and mode of exposure. Also, petroleum and petroleum constituents travel readily through air, soil, and water due to their volatility. Ease of transport causes rapid and widespread contamination of air, soil, and water, endangering drinking water sources, surface water bodies, and indoor air. IDEQ will work closely with its UST/LUST Program staff when assessing petroleum sites in order to correctly identify the potential threats to human health and the environment. Additionally, if contaminants are detected, results will be shared with state and local health departments. In addition to the myriad of potential contaminants, the range of site uses presents a range of potential exposures for different populations on or near the site. Exposure routes and durations will likely be different for a recreational user of a redeveloped site, assuming development as a park, than for a resident, assuming development as residential property. IDEQ as well as state and local health departments will keep site use and target populations, including sensitive populations such as pregnant women and newborns, in mind when reviewing assessment results, land use plans, and potential cleanup workplans. Potential exposures to target populations and site workers during cleanup and redevelopment will also be considered when analyzing assessment data and cleanup workplans.

A key to identifying site contaminants is a strong assessment plan. IDEQ's contractors are well versed in developing and submitting QAPP's to IDEQ for 128(a) assessment projects. For the purposes of this grant, IDEQ's contractor would submit QAPP's to EPA after submitting them first to IDEQ for comment. On large or complex sites, it may be appropriate to utilize the Triad approach to site assessment as this approach yields real time data which can be used to modify the assessment plan in the field. IDEQ developed a list of common contaminants associated with petroleum sites and will utilize this list in order to analyze site media for the proper suspected contaminants. Idaho Division of Health's Environmental Health Education and Assessment Program (EHEAP), in conjunction with the Agency for Toxic Substances and Disease Registry (ATSDR) developed a list of potential health effects for the contaminants found on IDEQ's list of contaminants. If

contaminants are found at assessed brownfields sites, IDEQ will utilize elements of the CIP to solicit health concerns of those residents living on or near the contaminated properties. EHEAP will provide health consultations and follow up health education for potentially exposed individuals as necessary.

Upon detection of measurable amounts of contaminants at a brownfields site, a risk evaluation will be conducted using REM software to determine if the risk associated with the contamination meets initial default target levels (IDTL) developed by IDEQ. If site contamination levels meet IDTL's, IDEQ will issue a "no further action letter" for the site. If not, IDEQ will conduct additional REM analyses, taking into account the type, extent, and magnitude of the contamination, the levels detected in affected media, potential exposure routes, receptors, and proposed land use. If this second level of risk analysis poses no unacceptable risk to human health and the environment, the project may be cleared for redevelopment with the use of institutional controls or a redesigned site use plan that uses construction techniques to cut off contamination from potential routes of exposure. If the risk to human health and the environment is unacceptable, an ABCA will be prepared for the site and made available for public comment.

It is difficult to project site uses without an inventoried and prioritized list of sites, however, the former petroleum sites IDEQ addressed with 128(a) funds proposed site uses including public recreational park, restaurants, car washes, retail stores, a rural fire station, an industrial park, and green space. Each of these land uses carry varying levels of exposure risk. IDEQ, in conjunction with state and local health departments, site developers, and community stakeholders will take great care to protect human health and the environment by thoroughly analyzing the mix between degree, type and location of contaminants, land use, proper application of institutional controls, and compliance with state and federal regulations.

2. Coordination with Local and State Health Agencies - IDEQ works closely with statewide local health departments, the Idaho Division of Health's EHEAP, the state epidemiologist, and the six regional environmental health directors. These agencies and their staff are tasked with protecting human health and are well versed in the fate, transport, and ecologic and health effects of exposure to environmental contamination. Local and district health departments are the front line of public health protection in Idaho. They protect the public health through inspections and regulation of private drinking water systems, participation in statewide emergency response episodes, and administration of public health programs. Additionally, local and district health departments are familiar with environmental issues associated with former petroleum sites and are a wealth of institutional knowledge concerning the location and histories of old, unregulated petroleum sites. IDEQ has a Memorandum of Understanding with all seven Health Districts to jointly address environmental impacts to human health and the environment.

Jim Vannoy, EHEAP Program Manager, committed to providing health assessment, health consultation, and health education as necessary in support of this project. EHEAP works under a grant from ATSDR which provides the funding for community health consultations and public health assessments for people living on or near contaminated sites. EHEAP agreed to include IDEQ's Brownfield Program in their 5-year work plan and agreed to conduct health consultations, outreach, and health education as requested and as necessary. EHEAP, in conjunction with the Agency for Toxic Substances and Disease Registry (ATSDR) developed a list of potential health effects for the contaminants found on IDEQ's list of contaminants associated with petroleum sites. If contaminants are found at assessed brownfields sites, IDEQ will utilize elements of the CIP to solicit health concerns of those residents living on or near the contaminated properties. EHEAP, in conjunction with local and district health department staff, will provide health consultations and follow up health education for potentially exposed individuals as necessary.

IDEQ developed a risk based approach to addressing environmental contaminants at brownfields (and others) sites. IDEQ's REM takes contaminant concentrations, exposure pathways, receptors, sensitive populations, media, land use, and other variables into consideration when generating a risk analysis for a contaminated site.

IDEQ personnel are experienced in accounting for environmental and human health risk from site contaminants as well as the design, implementation, and monitoring of remediation techniques to treat or remove site contaminants. IDEQ's Voluntary Cleanup Program (VCP) manager will assist with site risk analysis, cleanup planning, and land use planning in order to decrease environmental and public health threats due to site contamination. IDEQ will encourage site owners or prospective purchasers of contaminated sites to enter in to IDEQ's VCP program. The VCP program works with contaminated property owners to plan site remediation, conduct remediation, monitor site conditions post-clean up, and certify that cleanup is complete. For sites where some contamination is left in the impacted media, the VCP can require institutional controls to protect the environment and human health. Elimination of the potential for contaminants to migrate or to come into contact with humans can often be accomplished through careful planning and institutional controls. The VCP requires an analysis of cleanup options and a 30-day public comment period. Additionally, institutional controls enacted on properties participating in the VCP are tracked in IDEQ's remediation database. Individuals interested in utilizing brownfields cleanup financial incentives such as the RIBC RLF or Idaho's Community Reinvestment Pilot Initiative are required to participate in the VCP.

I. Leveraging of Additional Resources

1. Additional IDEQ Commitments - IDEQ's existing LUST and Response Program staff and infrastructure will substantially compliment the proposed assessment activities. IDEQ's Response Program Grant funds approximately \$350,000 in annual assessment activities (approx. ½ of these funds go toward petroleum assessments). IDEQ's UST/LUST Program allocates approximately \$400,000 annually toward staff oversight of LUST assessments and cleanups. Each site assessed using grant funds will have a LUST Program staff-person assigned to oversee and assist with reviewing assessment information and providing recommendations.

In addition, the LUST Program frequently obtains additional EPA funds for assessment projects, such as a \$100,000 in EPA funds obtained in FY06 to conduct assessment activities at several LUST sites in Preston, Idaho. The LUST Program was also awarded \$150,000 to conduct assessment activities at identified sites in the Boise area. Finally, the LUST Program manages a discretionary fund (funds can be used for assessment or cleanup) of approximately \$150,000. IDEQ will coordinate expenditure of all of these funds with the requested grant funds. Even with the resources listed above, IDEQ maintains a backlog of LUST sites in need of assessments, many of which are excellent brownfield candidates.

During the 2006 legislative session, the Idaho Legislature promulgated 'Community Reinvestment' amendments to Idaho's VCP. IDEQ's Response Program developed and presented the amendments, which make up to \$1,500,000 in state cleanup funds available to brownfield sites, including petroleum sites. IDEQ will select ten sites to receive up to \$150,000 each in state cleanup funds; rural sites with completed assessments and developed cleanup plans (together with cost estimates) will receive the highest priority under this new VCP effort. Accordingly, more petroleum sites will qualify to participate if we can complete assessments and develop proposed cleanup approaches for the sites via this grant.

2. IDEQ's Ability to Leverage Funds - In addition to the IDEQ resources listed above, IDEQ's Response Program is currently working with many partners to identify and prioritize brownfield sites in Idaho. IDEQ works with Idaho's six Economic Development Districts through the \$3,000,000 Brownfield Cleanup Revolving Loan Fund to prioritize and fund brownfield cleanups. IDEQ is working with Capital City Development Corporation (CCDC), Boise's urban renewal entity, to inventory and prioritize petroleum brownfields in Boise via CCDC's \$200,000 area-wide petroleum assessment grant. The same is true with respect to the City of Caldwell, which is currently implementing a \$200,000 area-wide petroleum assessment grant. IDEQ's Response Program assisted with the drafting of two FY07 area-wide petroleum assessment grants for the cities of Sandpoint and Meridian. IDEQ will coordinate its inventory and assessment efforts with the efforts of each of these communities.

J. Programmatic Capability

1. IDEQ's Grant Management Capabilities - As stated in response to 2 below, IDEQ successfully manages numerous federal grants; IDEQ has a 3-person grants management staff. IDEQ currently manages Section 128(a) funds of approximately \$800,000 annually; IDEQ has not managed Section 104 funds. With respect to this grant, IDEQ's Response Program staff will assume responsibility for completing all grant activities and reporting. Response Program staff includes 3 Brownfield Specialists that currently inventory and prioritize Idaho brownfields and then work to bring the most appropriate local, state and federal tools and funds to those projects. Staff also includes a registered Professional Geologist who currently provides input and oversight on all assessment activities conducted via IDEQ's Response Program. Staff currently works very closely with IDEQ's LUST staff. Staff currently complete ESA and NHPA consultation requirements, complete and update Property Profile Forms, manage contract and budgets for assessment activities, analyze assessment results including risk analyses and proposed cleanup approaches. IDEQ's Response Program leveraged 128(a) funds by working to form the 'Reuse Idaho Brownfields Coalition' (IDEQ is a coalition member), and helping draft a successful grant proposal for \$3,000,000 in Brownfield Cleanup RLF funds. The Response Program also drafted and presented legislation to the 2006 Idaho Legislature amendments to the Idaho VCP which included earmarking \$1,500,000 in state cleanup funds toward brownfields cleanups- previously \$0 in state funds went to brownfield-related activities. The Idaho Legislature unanimously promulgated the amendments and the Response Program is currently identifying brownfield sites for participation in the \$1,500,000 cleanup effort. Finally, the Response Program developed IDEQ's risk-Based Cleanup Guidance, which encompasses 185 chemicals and allows for site-specific cleanup approaches, use of institutional controls and other innovative tools. This risk-based approach results in substantial cleanup-cost savings for IDEQ when IDEQ conducts cleanups as well as for private parties conducting cleanups in Idaho.

2. IDEQ's History Managing Federal Funds - Since 1996, IDEQ has successfully managed approximately 75 federal assistance agreements annually from federal entities including: EPA, Department of Energy, Department of Defense, and Department of the Interior Bureau of Land Management. During this time, there have been no findings of any adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal or local government inspector general or similar organization, or audits conducted by the U.S. Government Accountability Office. IDEQ has never been required to comply with special "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.

3. Compliance with EPA Cooperative Agreements - Since July 1, 2003, the Idaho Department of Environmental Quality has successfully managed three (3) EPA Brownfields Cooperative Agreements including: RP-97056201 07/01/03 – 10/31/04; RP-97056202 11/01/04 – 09/30/06; and RP-97056203 11/01/06 – Present). In each agreement, the Idaho Department of Environmental Quality has successfully met compliance of all required administrative/programmatic conditions including those relating to progress/financial status reporting. IDEQ's Response Program: has completed detailed and timely progress reports (currently semi-annually); maintains updated PPFs for all sites where funds are expended; and recently successfully completed negotiations on its FY07 Work Plan. IDEQ often exceeds cooperative agreement requirements and expectations and has an excellent working relationship with EPA Region 10 staff.

4. Tracking and Measuring Progress - Per the Cooperative Agreement, IDEQ will work with Region 10 EPA to develop a detailed, task-by-task Work Plan (similar to IDEQ's approach with the 128(a) as the basis for tracking and measuring progress. Specifically, IDEQ will milestones and deliverables for the project and allows both IDEQ and the EPA grants administrator to communicate in terms understood by both parties. The Work Plan will outline the basic task requirements and then a schedule of deliverables designed around the tasks and milestones. IDEQ will report this information in Quarterly Reports, Property Profile Forms, through direct (telephone/email) communication with EPA Region 10. IDEQ will also track and post progress for the public to see via information posted on IDEQ's Brownfield Revitalization web page.